



10250 Constellation Blvd.
19th Floor
Los Angeles, CA 90067
310.553.3000 TEL
310.556.2920 FAX

Robert E. Allen

September 16, 2022

Direct Dial
310.282.6280

Direct Fax
310.785.3580

Email
rallen@glaserweil.com

VIA ECF

Hon. George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: 1:18-cv-08770-GBD-OTW - Gaffney v. Muhammad Ali Enterprises, et al.
1:20-cv-07113-GBD-OTW - Gaffney v. Authentic Brands Group, et al.
Request to Adjourn Pretrial Conference and Extend Time to File Pretrial Order

Dear Judge Daniels:

Plaintiff Michael Gaffney respectfully requests that the Court adjourn the pretrial conference presently scheduled for October 25, 2022 at 10:15 a.m. and reschedule the conference for December 20, 2022, or another date earlier in December that is acceptable to the Court.

Plaintiff further requests that the Court extend the time for the parties to file their joint pretrial order (in accordance with Section VI of the Individual Rules and Practices of Judge George B. Daniels) from the current deadline of October 7, 2022 to December 2, 2022, or approximately two weeks prior to the rescheduled pretrial conference.

The parties have not previously requested an adjournment or extension of the above deadlines.

Plaintiff requests the above adjournment and extension because he anticipates filing a motion for clarification and/or reconsideration to clarify a limited number of issues in the Court's summary judgment order. Plaintiff anticipates that resolution of this motion will facilitate settlement discussion and, in the absence of a settlement, will streamline trial preparation and could reduce the number of exhibits listed by plaintiff and increase the stipulations between the parties.

Counsel for defendants has indicated that defendants will not oppose this request.

Hon. George B. Daniels
September 16, 2022
Page 2

Respectfully submitted,

/s/ Robert E. Allen

ROBERT E. ALLEN
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP